

**AMENDMENTS TO THE DRAWINGS**

The attached sheet of drawings includes a change to Figure 2. On Figure 2, reference number 42 directed to the notch on the base 12 is changed to 58.

**REMARKS**

Receipt of the non-final office action mailed October 16, 2007 is acknowledged. Claims 1, 3, 5-12, and 14-22 are pending in the application and are rejected under 35 U.S.C. § 103(a) as obvious over U.S. Patent Application Publication No. 2002/0111203 (Chi).

The objection to claim 6 is corrected. Claim 6 is amended to depend from claim 1, rather than canceled claim 4.

Claim 1 is amended to recite, in relevant part, “that a lower surface of the puzzle piece directly contacts one of the first or second substrates such that the first and second substrates cooperate to form an electrical circuit thereby activating the sound generator.”

Similarly, claim 12 is amended to recite, in relevant part, that “a lower surface of the puzzle piece directly contacts one of the first or second substrates when the selected portion of the receiving area is depressed.”

Chi fails to disclose or suggest direct contact of the puzzle piece to one of the first or second substrates to cause the activation of the sound generator. Rather, Chi discloses an intervening face panel 34 that precludes direct contact between the puzzle piece and the upper circuit-contained film 31. Specifically, when a puzzle piece is placed on the face panel 34, the downward force of the puzzle piece 41 causes keys 341 on the lower surface of the face panel to move downward, which causes electric contact of two corresponding contacts 311, 331. Chi, paragraph 28-29. Accordingly, Chi does not disclose or suggest direct contact between the puzzle piece and the first or second substrate as disclosed in each of claims 1 and 12.

Moreover, there is no motivation to modify Chi to provide for direct contact between the puzzle piece 41 and the upper circuit-contained film 31 because such modification would require one to destroy or discard the expressly taught face panel 34 and keys 341. Furthermore, Chi is directed at providing “a sound-emitting jigsaw puzzle having *improved key structure*.” Chi, paragraph 1. Eliminating the keys 341 to provide for direct contact of the puzzle piece and the upper circuit-contained film 31 would render Chi unsuitable for its intended purpose of providing a puzzle with an *improved key structure*. Thus, there is no motivation to modify Chi to provide for the invention of claims 1 and 12. Accordingly, no

*prima facie* case of obviousness can be based on Chi. Claims 1 and 12 are, therefore, allowable.

Claims 3 and 5-11 depend from independent claim 1. Claims 14-19 depend from independent claim 12. Claims 1 and 12 are shown above to be allowable, therefore, claims 3, 5-11, and 14-19 are also allowable.

Claim 20 is amended to recite, in relevant part, “substrate assembly including only a first substrate, only a second substrate, and only a third substrate.” Claim 20 further recites that “the first, second, and third substrates [are] formed from the same *paperboard* panel and connected to one another by fold lines.”

Chi does not disclose or suggest a puzzle having a substrate assembly including only a first substrate, only a second substrate, and only a third substrate. Rather Chi discloses a key unit 3 that “includes an upper and lower circuit-contained film 31, 33, an isolating film 32, sandwiched between the upper and the lower films 31, 33, and a face panel 34 [with downward protruded keys 341] spread over the upper circuit-contained film 31.” Chi, paragraph 21 and 24. Accordingly, Chi does not disclose only a first, only a second, and only a third substrate.

Moreover, there is no motivation to modify Chi to provide for the substrate assembly of claim 20 because such modification would require one to destroy or disregard the expressly taught face panel 34 and keys 341. As Chi is directed at providing “a sound-emitting jigsaw puzzle having *improved key structure*, eliminating the keys 341 would render Chi unsuitable for its intended purpose of providing a puzzle with an *improved key structure*. Thus, there is no motivation to modify Chi to provide for the substrate assembly of claim 20.

Chi, also, does not disclose or suggest first, second, and third substrates that are formed from the same *paperboard* panel. Rather, Chi expressly discloses upper and lower circuit contained *films* 31, 33 and an isolating *film* 32. Furthermore, Chi does not disclose or suggest any limitation of forming the upper and lower circuit contained films and the isolating film from films. Therefore, one of ordinary skill in the art would not be motivated to modify Chi to provide for the films being formed from a single paperboard panel as disclosed in claim 20 because such modification would require one to disregard the express

teaching of Chi that the upper and lower circuit-contained films 31, 33 and isolating film 32 are formed from films. Accordingly, Chi fails to disclose or suggest first, second, and third substrates that are formed from the same paperboard panel.

Furthermore, Chi does not disclose or suggest first, second, and third substrates that are connected to one another by fold lines. Rather, as clearly shown in Figure 1, the upper and lower circuit-contained films 31, 33 and the isolating film 32 are three separate, unconnected films. Chi does not disclose or suggest that the films are connected to one another in any way, let alone by fold lines. Nothing in Chi discloses or suggests any limitation of having upper and lower circuit-contained films 31, 33 and the isolating film 32 as separate, unattached films. Therefore, one of ordinary skill in the art would not be motivated to modify the films of Chi and connect the upper and lower circuit-contained films 31, 33 and the isolating film 32 by fold lines as disclosed in claim 20. Thus, Chi fails to disclose or suggest each and every element of the invention of claim 20. Accordingly, no *prima facie* case of obviousness can be based on Chi. Therefore, claim 20 is allowable.

Claim 21 is amended to recite, in relevant part, a puzzle that includes a “second substrate having only a plurality of conductive ink dots.” Chi does not disclose or suggest a puzzle having a second substrate with only a plurality of conductive ink dots. Rather, Chi expressly discloses that both “[t]he upper and lower circuit contained-films 31, 33 are provided with a plurality of longitudinal and transverse conductive lines [and] a plurality of contacts 311, 331 . . . equally spaced on the longitudinal and the transverse conductive lines. . .” Chi, paragraph 22. Moreover, there is no motivation to modify Chi to provide for a second substrate having only a plurality of conductive ink dots as disclosed in claim 21 because such modification would require one to destroy or disregard the conductive lines on one of the upper or lower circuit-contained films 31, 33. Accordingly, no *prima facie* case of obviousness can be based on Chi. Therefore, claim 21 is allowable.

Claim 22 depends from independent claim 21. Claim 21 is shown above to be allowable, therefore claim 22 is also allowable.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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